

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DEBTORS' NOTICE OF SETTLEMENT PURSUANT TO
SMALL ESTATE CLAIMS SETTLEMENT PROCEDURES ORDER**

FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby file this *Notice of Settlement(s) Pursuant to Small Estate Claims Settlement Procedures Order* (the “Notice”) pursuant to the *Order Authorizing and Approving Procedures for Settling Certain Existing and Future Litigation Claims and Causes of Action* (the “Small Estate Claims Settlement Procedures Order”) entered on September 11, 2023 [D.I. 2487], and aver as follows:

1. In or about July 2023, the Debtors sent demands to certain potential defendants for the avoidance and recovery of certain potential transfers pursuant to sections 547, 548, 549 and/or 550 of title 11 of the United States Code (the “Potential Avoidance Actions”).
2. The Debtors have negotiated the settlement of the Potential Avoidance Actions identified on **Exhibit A** attached hereto (the “Proposed Settlement”).
3. Absent any objections served on or before December 6, 2023, and interposed in accordance with the terms of the Small Estate Claims Settlement Procedures Order, the settlement

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

listed on **Exhibit A** shall be deemed approved without any further action of the Debtors or the Court.

Dated: November 29, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
mcguire@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christopher J. Dunne (admitted *pro hac vice*)
Jacob M. Croke (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
dunnec@sullcrom.com
crokej@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession